

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:  
W. R. GRACE & CO., et al.<sup>1</sup> ) Chapter 11  
Reorganized Debtors. )  
                                  ) Case No. 01-01139 (KG)  
                                  ) (Jointly Administered)  
                                  )  
                                  ) Hearing Date: TBD  
                                  ) Objection Deadline: March 22, 2017 at 4:00 p.m.

**NOTICE OF MOTION TO STRIKE THE SHARPE AND CONLEY DECLARATIONS**

TO: (i) the Office of the United States Trustee; (ii) Counsel for the WRG Asbestos PI Trust; (iii) Counsel for the Asbestos PI Future Claimants Representative; (iv) Counsel for the Asbestos PD Future Claimants Representative; (v) Counsel for the WRG Asbestos PD Trust (7A); (vi) Counsel for the WRG Asbestos PD Trust (7B); (vii) Counsel for the CDN ZAI PD Claims Fund; (viii) those parties that requested service and notice of papers in accordance with Fed. R. Bankr. P. 2002; and (ix) counsel for Norfolk Southern Railway Company.

On March 8, 2017, the above-captioned reorganized debtors (collectively, the “Reorganized Debtors”) filed the attached *Motion to Strike the Sharpe and Conley Declarations* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801 (the “Bankruptcy Court”). A true and correct copy of the Motion is attached hereto.

Responses to the relief requested in the Motion, if any, must be in writing and be filed with the Bankruptcy Court no later than **March 22, 2017**. At the same time, you must also serve a copy of the objections or responses, if any, upon co-counsel for the Reorganized Debtors,

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<sup>1</sup> The Reorganized Debtors comprise of W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or “Grace”) and W. R. Grace & Co.-Conn. (“Grace-Conn.”).

(i) John Donley, Esquire, Kirkland & Ellis LLP, 300 N. LaSalle, Chicago, IL, 60654; (ii) Roger Higgins, Esquire, The Law Offices of Roger Higgins, 1 North Bishop Street, Suite 14, Chicago, IL 60607-1823; and (iii) James E. O'Neill, Esquire, Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, P.O. Box 8705, Wilmington, DE 19899-8705 (Courier 19801).

IF NO OBJECTIONS ARE TIMELY FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

IN THE EVENT THAT ANY OBJECTION OR RESPONSE IS FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, A HEARING ON THE MOTION WILL BE HELD BEFORE THE HONORABLE KEVIN GROSS AT THE UNITED STATES BANKRUPTCY COURT, 824 MARKET STREET, SIXTH FLOOR, COURTROOM 3, WILMINGTON, DELAWARE 19801, ON A **DATE AND TIME TO BE DETERMINED**.

Dated: March 8, 2017

THE LAW OFFICES OF ROGER HIGGINS, LLC  
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and

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/s/ James E. O'Neill

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